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DAISY LOVE, : UNITED STATES DISTRICT COURT
Plaintiff, : FOR THE DISTRICT OF NEW JERSEY
v. :
RANCOCAS HOSPITAL, et al :
Defendants. : CIVIL ACTION NO.: 01CV5456 (SMO)

**NOTICE OF MOTION FOR LEAVE TO AMEND COMPLAINT
TO ADD BETII BENN, R.N. AND BETH SLIMM, R.N. AS DEFENDANTS**

TO: Jennifer L. Parsons, Esquire Sharon K. Galpern, Esquire Stahl & DeLaurentis, P.C. 1103 Laurel Oak Road, Suite 103 Voorhees, NJ 08043	Jay J. Blumberg, Esquire Michael Lindner, Esquire Blumberg & Lindner 158 Delaware Street Woodbury, NJ 08096
Timothy P. O'Brien, Esquire Frank F. Calo, III, Esquire Parker McCay & Criscuolo, P.C. Three Greentree Centre, Suite 401 Marlton, NJ 08053	Benjamin H. Hastel, Esquire Law Offices of Francis Schachtel 15 Millstone Road Building 200, Suite 160 East Windsor, NJ 08520

PLEASE TAKE NOTICE that on _____ at _____ a.m. the undersigned will apply to the Court at the United States Courthouse in Camden, New Jersey, for an order granting plaintiff leave to amend her complaint to add Beth Benn, R.N., and Beth Slimm, R.N. as defendants to this action. The undersigned will rely on the Motion and Memorandum of Law

attached to this Notice of Motion. A proposed form of order is also attached. Oral argument is requested.

KLINÉ & SPECTER

By:


Richard S. Seidel, Esquire
1940 Route 70 East, Suite 200
Cherry Hill, NJ 08003
609/424-9162

Date: February 23, 2004

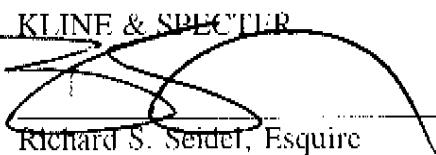
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DAISY LOVE, : UNITED STATES DISTRICT COURT
: FOR THE DISTRICT OF NEW JERSEY
Plaintiff, :
v. :
RANCOCAS HOSPITAL, et al :
Defendants. : CIVIL ACTION NO.: 01CV5456 (SMO)

**MOTION FOR LEAVE TO AMEND COMPLAINT PURSUANT
TO FEDERAL RULE OF CIVIL PROCEDURE 15 TO ADD
BETH BENN, R.N. AND BETH SLIMM, R.N. AS DEFENDANTS**

Plaintiff, Daisy Love, by and through her undersigned counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 15, for leave to amend her Complaint to add Beth Benn, R.N. and Beth Slimm, R.N. as party defendants in this case. In support of the instant motion, plaintiff incorporates herein by reference and makes a part hereof the annexed memorandum of law.

Respectfully submitted,

By: 
Richard S. Seidel, Esquire
1940 Route 70 East, Suite 200
Cherry Hill, NJ 08003
609/424-9162

Date: February 23, 2004